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NAS CECIL FIELD
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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING RECORD OF
DECISION OPERABLE UNIT 2 (OU2) NAS CECIL FIELD FL
9/18/1995
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

September 18, 1995

4WD-OHA

MEMORANDUM

SUBJECT: Record of Decision Comments, NAS Cecil Field

FROM: William N. O'Steen, Environmental Scientist
Office of Health Assessment
Waste Management Division

THROUGH: Elmer Akin, Chief
Office of Health Assessment
Waste Management Division

TO: Bart Reedy, Remedial Project Manager
Federal Facilities, DOD Remedial Section

This memorandum responds to your request for a review of the draft Record of Decision (ROD) for the NAS Cecil Field Operable Unit (OU) 2. For your convenience, these comments are referenced to specific sections or pages of the draft ROD, as applicable.

On page 15, Section 2.7.2 states that at Site 17, contaminants have migrated approximately 200 feet to the east. This distance is inconsistent with the 130-foot ground water contaminant transport distance from the downgradient margin of the Site 17 pit, which is described on page 11. Section 2.7.2 should probably also reference the contaminant transport distance to the downgradient margin of the former disposal pit.

Because the OU2 Remedial Action covers both Site 5 and Site 17, the discussion of remedial alternatives in Section 2.7 should present the projected remedial costs and remedial time frames for the individual sites. The ROD presents only a single projected cost and time frame for each remedial alternative. Site 5 and Site 17 are not exactly the same; therefore, it seems unlikely that either the remedial costs or the projected time frames for a specific remedial alternative would be equivalent for each site.

At the top of page 18 of the ROD, the text states "If necessary groundwater will be treated onsite at those locations where chemicals of concern exist at concentrations above the ambient levels of the plume." The specific treatment or types of treatment envisioned, and the conditions which will define "If necessary" should be mentioned in this part of the ROD.

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Otherwise, the proposal is too vague and may result in a future dispute concerning the Site 17 ground water remedial action.

On page 18, the ROD states "Natural attenuation was selected at Site 17 because evaluation of measurements made and data collected during the site investigations indicate that this process is currently active." In my last involvement with this Operable Unit (a meeting on 8/10/95 at NAS Cecil Field), a detailed analysis of natural attenuation indicators at Site 17 was an uncompleted action item. Therefore, I have not seen an acceptable evaluation of natural attenuation indicators at Site 17, which presumably is the evaluation referenced on page 18 of the ROD. It is not necessary that I review this natural attenuation evaluation to concur with the selected ground water remedial action for Site 17. However, the evaluation should be complete and available as a part of the administrative record for this site. Any natural attenuation evaluation done previous to the referenced August 10 meeting is not, in my opinion, adequate to support a statement in the ROD that "...evaluation of measurements made and data collected during the site investigations indicate that this process is currently active."

If you have any questions regarding this memorandum, or require additional technical assistance, please contact me at x6382.